# EXHIBIT "F"

Bottomline Legal eXchange

Legal eXchange Invoice from Kern and Wooley LLP

Invoice Number:

00070017749001

Invoice Date:

05/20/2004

REDACTED

Description:

Matter Number:

0381134100

Matter Name:

ASHOU, RAYMONDA v ASHOU, RAYMONDA (0043982940001)

Customer Pay Name: Customer Pay Number:

Firm Tax ID:

95-2829952

Firm Address:

11100 Santa Monica Blvd., 7th Floor

Los Angeles, CA 90025

Fees:

Date

Code Hours Rate Name

Orig. Curr. Amt Amt

Description

#### REDACTED

09/12/2003

22 L210 0.10 \$183.00\$18.30

\$18.30

Pleadings - Prepare local rule certification as to Interested Parties.

Case 3:07-cv-04651-CRB

#### REDACTED

09/12/2003 Craig Pynes	23 L110 1.20	\$183.00\$219.60	\$219.60	Review and analyze claim file materials for possible motion to dismiss and/or motion for summary judgment and for use in preparing discovery.
09/12/2003 Craig Pynes	26 L120 1.10	\$183.00 \$201.30	\$201.30	Analysis/Strategy - Analyze case law allowing recovery for damages for lesser of diminution in value or cost of repair where homeowner has not actually incurred out of pocket expense to pay for repairs for motion workup or discovery.
09/12/2003 Craig Pynes	27 L120 1.30	\$183.00 \$237.90	\$237.90	Analysis/Strategy - Analyze case law interpretation of whether LMI tolling applies to CCP 340.9, and, if so, what actions are required by insurer to effect tolling for motion to dismiss or summary judgment.

## **REDACTED**

09/12/2003 Craig Pynes	$17 \frac{L210}{20} 0.30$	\$183.00\$54.90	\$54.90	Pleadings - Review Ashou complaint for removal and responsive pleadings.
09/12/2003 Craig Pynes	18 L210 0.30	\$183.00\$54.90	\$54.90	Pleadings - Discuss motions to remove, dismiss and for summary judgment with Susan Olson.

## REDACTED

09/12/2003 Craig Pynes 25 20 0.20 \$183.00\$36.60 \$36.60 Analysis/Strategy - Prepare memo to Teresa Ruffino re: market value research and discuss same with her.

#### **REDACTED**

Craig L210

Pleadings - Prepare Notice of Removal

09/12/2003 Pynes	19	20 0.10	\$183.00 \$18.30	\$18.30	of Action to Federal Court.
09/12/2003 Craig Pynes	20	L210 20 0.20	\$183.00 \$36.60	\$36.60	Pleadings - Prepare declaration of Susan Olson in support of Notice of Removal of Action to Federal court.
09/12/2003 Craig Pynes	21	L210 20 0.10	\$183.00 \$18.30	\$18.30	Pleadings - Prepare Notice to Adverse Party of Removal of Action to Federal Court.
09/12/2003 Craig Pynes	24	L120 0.20	\$183.00 \$36.60	\$36.60	Analysis/Strategy - Discuss motion and discovery workup with Susan Olson.
		REDAC	TED		
09/14/2003 Craig Pynes	.29	L240 20 1.30	\$183.00 \$237.90	\$237.90	Dispositive Motions - Analyze case law addressing whether earthquake revival statute tolls revived claims during period that claim is reopened for motion to dismiss/ summary judgment.  Dispositive Motions - Analyze case law
09/15/2003 Craig Pynes	35	L240 20 1.20	\$183.00 \$219.60	\$219.60	interpretation addressing whether plaintiff's sale of her house allows application of Insurance Code 2071 to bar her claim for Motion to Dismiss and/or Motion for Summary Judgment.
09/15/2003 Craig Pynes	38	20 L240 0.20	\$183.00\$36.60	\$36.60	Dispositive Motions - Prepare correspondence to plaintiff's counsel re: same.
09/15/2003 Craig Pynes	39	L210 20 0.20	\$183.00 \$36.60	\$36.60	Pleadings - Continue preparing Notice of Removal of Action; declaration of Susan Olson in support of same; Notice to Adverse Party re: removal and Local Rule 83-1.5 Certification as to Interested Parties.
RE	DA	CTED			
09/15/2003 Craig Pynes	33	20 L240 <sup>0.40</sup>	\$183.00 \$73.20	\$73.20	Dispositive Motions - Discuss Motion to Dismisss and/or Motion for Summary Adjudication with Susan Olson.
R	ED/	ACTED			
09/15/2003 Craig Pynes	34	L120 20 0.40	\$183.00 \$73.20	\$73.20	Analysis/Strategy - Analyze underlying file materials re: timing of underlying events for motion to dismiss or for summary judgment.

Dispositive Motions - Review and

summary judgment.

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09/15/2003	Craig Pynes	36	20 L240 0.90	\$183.00 \$164.70	\$164.70	analyze legislative history of Civil Code 340.9 for use in same.
	•			\$183.00 \$18.30		Dispositive Motions - Telephone conference with plaintiff's counsel re: extension to respond to complaint.
09/15/2003	Craig Pynes	40	L240 20 0.50	\$183.00\$91.50	\$91.50	Dispositive Motions - Analyze case law interpretation of whether CCP 340.9 is subject to equitable tolling or absolute on its face.
09/16/2003	Craig Pynes	42	L110 20 0.40	\$183.00\$73.20	\$73.20	Fact Investigation/Development - Review and analyze Aces notes for use in discovery and motion workup.
				REDACTED		
09/17/2003	Craig Pynes	46	L210 0.30	3 \$183.00 \$54.90	\$54.90	Pleadings - Continue preparing removal documents; identify exhibits to same and finalize same.

Document/File Management -

Telephone conferences with Stephen

Losh, plaintiff's counsel, re: removal of

action to federal court and stipulation to extend date to respond to complaint.

#### **REDACTED**

 $47 \ \frac{L140}{20} \ 0.20 \quad \$183.00 \,\$36.60$ 

09/17/2003 Craig Pynes	50 20 0.20 L120 0.20	\$183.00\$36.60	\$36.60	Analysis/Strategy - Prepare memo to file re: Ashou counsel's representations regarding client for investigation regarding same.
09/17/2003 Craig Pynes	51 20 0.20	\$183.00\$36.60	\$36.60	Pleadings - Prepare Civil Case Cover Sheets for Notice of Removal.
09/17/2003 Craig Pynes			\$219.60	Dispositive Motions - Review and analyze case law addressing genuine dispute with insured precludes bad faith for same, including reliance on independent experts for same.
09/17/2003 Craig Pynes	55 L240 0.50	\$183.00 \$91.50	\$91.50	Dispositive Motions - Discuss estoppel and statute of limitations arguments for same with Susan Olson.

\$36.60

09/17/2003 Craig Pynes	48 L210 0.20	\$183.00\$36.60	\$36.60	re: extension of Liberty's time to respond to complaint per district court requirements.
09/17/2003 Craig Pynes	49 <sup>20</sup> <sub>L320</sub> 0.30	\$183.00\$54.90	\$54.90	Document Production - Prepare subpoenas to county recorders office and building and safety department for earthquake records and review available information on-line.
09/17/2003 Craig Pynes	$52 \ \frac{L210}{20} \ 0.20$	\$183.00 \$36.60	\$36.60	Pleadings - Telephone conferences with court re: removal of action.
09/17/2003 Craig Pynes	53 L240 1.10	\$183.00\$201.30	\$201.30	Dispositive Motions - Review and analyze case law addressing provision of policy benefits precludes breach of contract and bad faith for motions for summary judgment and to dismiss.
09/17/2003 Craig Pynes	56 L240 0.90	\$183.00 \$164.70	\$164.70	Dispositive Motions - Analyze case law finding that revival statute is not subject to tolling for same.

09/18/2003 Craig Pynes	64 <sup>20</sup> <sub>L210</sub> 0.20	\$183.00\$36.60	\$36.60	Pleadings - Telephone conferences with court re: removal of action and decision not to remove same.
09/18/2003 Craig Pynes	65 L120 0.30	\$183.00\$54.90	\$54.90	Analysis/Strategy - Discuss case workup in state court in lieu of removal wtih Susan Olson.
09/18/2003 Craig Pynes	66 <sup>20</sup> <sub>L110</sub> 0.20	\$183.00\$36.60	\$36.60	Fact Investigation/Development - Review and analyze comparable information for property from 10/93 to 3/94 and 10/96 to 2/97 and discuss same with Teresa Rufino.

Filed 12/12/2007

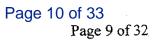


09/18/2003 Craig Pynes 09/19/2003 Craig Pynes		\$183.00\$530.70 \$183.00\$36.60		Dispositive Motions - Draft demurrer to complaint addressing statute of limitations preclusion; inapplicability of equitable estoppel and threshold appraisal requirement precluding action. Fact Investigation/Development - Review and analyze complaint for motion to strike.
09/19/2003 Craig Pynes	69 L210 1.10	\$183.00 \$201.30	\$201.30	Pleadings - Prepare Motion to Strike.
09/19/2003 Craig Pynes	<u> </u>	\$183.00\$91.50	\$91.50	Analysis/Strategy - Review and analyze plausibility of attacking complaint on general statutes of limitations appliable to breach of contract and bad faith claims under Code of Civil Procedure 337 and 339(1) for dispositive motion.
09/19/2003 Craig Pynes	71 L240 0.50	\$183.00\$91.50	\$91.50	Dispositive Motions - Review and analyze authorities for judicial notice of various documents in support of demurrer and prepare Request for Judicial Notice authenticating 7 exhibits to demurrer and motion to strike.
09/19/2003 Craig Pynes	$72 \frac{20}{L240} 0.50$	\$183.00\$91.50	\$91.50	Dispositive Motions - Continue preparing demurrer.
09/19/2003 Craig Pynes	73 L240 0.20	\$183.00\$36.60	\$36.60	Dispositive Motions - Prepare alternative orders on demurrer and motion to strike.
09/19/2003 Craig Pynes	76 <sup>20</sup> <sub>L140</sub> 0.10	\$183.00\$18.30	\$18.30	Document/File Management - Telephone conference with plaintiff's counsel re: non-removal of action to federal court.
09/19/2003 Craig Pynes	74 L320 0.20	\$183.00 \$36.60	\$36.60	Document Production - Continue preparing subpoena to Building and Safety Department and prepare notice of deposition of person most knowledgeable re: records from same
09/19/2003 Craig Pynes	75 L320 0.10	\$183.00 \$18.30	\$18.30	Document Production - Telephone conference with County Recorder's Office re: production of records relating to plaintiff's home.

09/22/2003 Craig Pynes	85	L320 20 0.10	\$183.00\$18.30	\$18.30	Document Production - Telephone conference with County Recorders Office re: production of records for plaintiff's prior home.
09/22/2003 Craig Pynes	86	L140 20 0.20	\$183.00\$36.60	\$36.60	Document/File Management - Discuss status of discovery of county recorders documents; plaintiff's side-dealing with son and large financing before sale and investigation of sale with Susan Olson.
09/22/2003 Craig Pynes	87	$\frac{L240}{20}$ 0.80	\$183.00 \$146.40	\$146.40	Dispositive Motions - Continue preparing demurrer.
09/22/2003 Craig Pynes	88	L210 0.30	\$183.00\$54.90	\$54.90	Pleadings - Continue preparing Motion to Strike.
09/22/2003 Craig Pynes	89	L210 0.10	\$183.00\$18.30	\$18.30	Pleadings - Continue preparing Request for Judicial Notice in support of demurrer and motion to strike.
09/22/2003 Craig Pynes	90	L210 20 0.20	\$183.00 \$36.60	\$36.60	Pleadings - Continue preparing alternative orders for grounds for demurrer and motion to strike.

09/23/2003 Craig Pynes	93 L210 0.50	\$183.00\$91.50	\$91.50	Pleadings - Analyze means by which case can be remanded back to state court.
09/23/2003 Craig Pynes	94 $\frac{L210}{20}$ 0.20	\$183.00 \$36.60	\$36.60	Pleadings - Prepare Stipulation and Order to Remand Case to State Court.

09/23/2003 Craig Pynes	95 $\frac{L210}{20}$ 0.10	\$183.00\$18.30	\$18.30	Pleadings - Discuss declaration in support of same with Beverly Auxier.
09/23/2003 Craig Pynes	96 $\frac{L210}{20}$ 0.10	\$183.00 \$18.30	\$18.30	Pleadings - Prepare declaration of Beverly Auxier in support of same.
09/23/2003 Craig Pynes	97 L210 0.20	\$183.00\$36.60	\$36.60	Pleadings - Prepare correspondence to plaintiff's counsel re: same.
09/24/2003 Craig Pynes		\$183.00 \$36.60	\$36.60	Dispositive Motions - Continue preparing demurrer.
09/24/2003 Craig Pynes	99 20 0.10 L210	\$183.00\$18.30	\$18.30	Pleadings - Continue preparing Motion to Strike and Request for Judicial Notice.
09/24/2003 Craig Pynes	$100\frac{L210}{20}$ 0.10	\$183.00\$18.30	\$18.30	Pleadings - Telephone conference with plaintiff's counsel, Stephen Losh, re: revised stipulation to remand action to state court.
09/24/2003 Craig Pynes	101 <sup>20</sup> <sub>L210</sub> 0.20	\$183.00\$36.60	\$36.60	Pleadings - Supplement Stipulation to Remand Action to State court and prepare correspondance to plaintiff's counsel re: execution of supplemented stipulation.
09/25/2003 Craig Pynes	102 <sup>20</sup> <sub>L210</sub> 0.10	\$183.00 \$18.30	\$18.30	Pleadings - Telephone call from Stephen Losh re: stipulation to remand action to state court and prepare requested document for forwarding to same.
09/26/2003 Craig Pynes	$103_{L120}^{20}$ 0.20	\$183.00\$36.60	\$36.60	Analysis/Strategy - Review federal and local rules re: extension pending remand to state court.
09/26/2003 Craig Pynes	$104_{L120}^{20}$ 0.10	\$183.00\$18.30	\$18.30	Analysis/Strategy - Prepare memo to file re: same.
09/26/2003 Craig Pynes	105 <sup>L140</sup> <sub>20</sub> 0.10	\$183.00 \$18.30	\$18.30	Document/File Management - Telephone conference with plaintiff's counsel, Stephen Losh re: stipulation to extend response date pending remand to state court.
09/26/2003 Craig Pynes		\$183.00 \$36.60	\$36.60	Pleadings - Prepare Stipulation re: same.
09/26/2003 Craig Pynes	$107_{20}^{L140} 0.10$	\$183.00 \$18.30	\$18.30	Document/File Management - Prepare correspondence to Mr. Losh re: same.
09/30/2003 Craig Pynes	$108_{20}^{L110}$ 0.20	\$183.00\$36.60	\$36.60	Fact Investigation/Development - Review documents produced by County Recorders Office.
09/30/2003 Craig Pynes	109 <sup>20</sup> L320 0.10	\$183.00\$18.30	\$18.30	Document Production - Telephone conference with County Recorders office and DDS re: production of complete file materials requested.
09/30/2003 Craig Pynes	$110_{L190}^{20}$ 0.50	\$183.00\$91.50	\$91.50	Other Case Assessment, Development and Admin Prepare summary of case for meetings with home office.



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10/01/2003 Craig Pynes	$113\frac{L140}{20}$ 0.10	\$183.00 \$18.30	\$18.30	Document/File Management - Telephone conference with court re: status of case remand to state court. Other Case Assessment, Development			
10/01/2003 Craig Pynes	$114 \frac{20}{L190} \ 0.20$	\$183.00 \$36.60	\$36.60	and Admin Continue preparing case summary for meeting with home office personel.			
10/01/2003 Craig Pynes	115 <sup>20</sup> <sub>L190</sub> 0.10	\$183.00\$18.30	\$18.30	Other Case Assessment, Development and Admin Telephone conference with plaintiff's counsel re: case remand to the state court.  Other Case Assessment, Development			
10/02/2003 Craig Pynes	$116_{20}^{L190}$ 0.10	\$183.00 \$18.30	\$18.30	and Admin Continue preparing case summary for home office meetings.			
10/03/2003 Craig Pynes	$117 \frac{\text{L210}}{20} \ 0.10$	\$183.00 \$18.30	\$18.30	Pleadings - Prepare Notice of Order Remanding Case to State Court.  Telephone			
10/06/2003 Craig Pynes	118 <sup>20</sup> <sub>L320</sub> 0.10	\$183.00 \$18.30	\$18.30	Document Production - Telephone conference with DDS re: status of production of county recorder's file materials.			
10/07/2003 Craig Pynes	119 <sup>L240</sup> <sub>20</sub> 0.60	\$183.00 \$109.80	\$109.80	Dispositive Motions - Compile numerous exhibits for demurrer and finalize demurrer; motion to strike; request for judicial notice and notice reremand for filing.			
10/08/2003 Craig Pynes	120 <sup>L320</sup> <sub>20</sub> 0.10	\$183.00 \$18.30	\$18.30	Document Production - Telephone call from LA Building Department re: status of production of documents for plaintiff's home.			
10/09/2003 Craig Pynes	121 L320 0.10	\$183.00 \$18.30	\$18.30	Document Production - Telephone conference with DDS re: production of County Recorder documents.			
10/11/2003 Craig Pynes	122 <sup>20</sup> <sub>L190</sub> 0.20	\$183.00 \$36.60	\$36.60	Other Case Assessment, Development and Admin Prepare correspondence to client re: responsive pleadings and brief update.			
10/14/2003 Craig Pynes	$123 \frac{L190}{20} 0.10$	\$183.00 \$18.30	\$18.30	Other Case Assessment, Development and Admin Finalize letter to client re: responsive pleadings.			
REDACTED							
10/17/2003 Craig	125 0.40 L110	\$183.00 \$73.20	\$73.20	Fact Investigation/Development - Review and analyze California public records re: Raymonda Ashou criminal			

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Pynes	20			and other relevant history for use in working up initial evaluation report.
10/17/2003 Craig Pynes	126 <sup>20</sup> <sub>L120</sub> 1.50	\$183.00 \$274.50	\$274.50	Analysis/Strategy - Begin preparing initial evaluation of action letter to client.
10/22/2003 Craig Pynes	$127_{L120}^{20}$ 0.80	\$183.00\$146.40	\$146.40	Analysis/Strategy - Continue preparing comprehensive evaluation letter.  Dispositive Motions - Telephone call
10/24/2003 Craig Pynes	$128_{L240}^{20}$ 0.20	\$183.00\$36.60	\$36.60	from Stephen Losh re: withdrawal of Demurrer and Motion to Strike to allow same to file first amended complaint.
10/24/2003 Craig Pynes	129 <sup>L240</sup> <sub>20</sub> 0.20	\$183.00\$36.60	\$36.60	Dispositive Motions - Prepare memo to file analyzing same.  Dispositive Motions - Telephone
10/28/2003 Craig Pynes	$130_{20}^{L240}$ 0.10	\$183.00\$18.30	\$18.30	conference with plaintiff's counsel Stephen Losh re: withdrawal of demurrer in light of appraisal demand.
10/30/2003 Craig Pynes	131 <sup>L120</sup> <sub>20</sub> 0.20	\$183.00 \$36.60	\$36.60	Analysis/Strategy - Telephone conference with plaintiff's counsel, Stephen Losh, re: amending complaint in lieu of Opposing demurrer and motion to strike and prepare memo to file re: same.
10/31/2003 Craig Pynes	132 <sup>L320</sup> <sub>20</sub> 0.20	\$183.00\$36.60	\$36.60	Document Production - Review and analyze documents produced by the City of Los Angeles, Department of Building and Safety.
10/31/2003 Craig Pynes	133 <sup>L320</sup> <sub>20</sub> 0.30	\$183.00\$54.90	\$54.90	Document Production - Review and analyze documents produced by the County Recorder's Office for plaintiff's insured residence.
11/03/2003 Craig Pynes	$136_{20}^{L210}$ 0.10	\$183.00 \$18.30	\$18.30	Pleadings - Prepare memo to file re: same.
	REDACTE			
11/03/2003 Craig Pynes	135 <sup>L210</sup> <sub>20</sub> 0.60	\$183.00 \$109.80	\$109.80	Pleadings - Review and analyze Plaintiff's First Amended Complaint and caselaw cited therein.
	REDACTE	D		
11/04/2003 Craig Pynes	144 <sup>L120</sup> <sub>20</sub> 0.50	\$183.00\$91.50	\$91.50	Analysis/Strategy - Review and analyze case law re: striking plaintiffs irrelevant and prejudicial allegations regarding her employment.

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11/04/2003 Craig Pynes	145 <sup>L210</sup> 0.60	\$183.00 \$109.80	\$109.80	Pleadings - Prepare motion to strike improper damages allegations and irrelevant and inflammatory allegations. Written Discovery (RFAs &
11/04/2003 Craig Pynes	146 <sup>L310</sup> <sub>20</sub> 0.10	\$183.00 \$18.30	\$18.30	Interrogatories) - Review plaintiff's special interrogatories and production requests.
11/04/2003 Craig Pynes	147 <sup>L210</sup> <sub>20</sub> 0.10	\$183.00 \$18.30	\$18.30	Pleadings - Telephone conference with Stephen Losh re: withdrawal of demurrer and motion to strike as moot in light of amended complaint.
11/04/2003 Craig Pynes	$148 \frac{L240}{20} 0.80$	\$183.00\$146.40	\$146.40	Dispositive Motions - Prepare demurrer to First Amended Complaint.

11/04/2003 Craig Pynes	141 <sup>20</sup> 1.30	\$183.00 \$54.90	\$54.90	Dispositive Motions - Review and analyze case law authorizing court to sustain demurrer without leave to amend where plaintiff has tried to unsuccessfully amend for demurrer to amended complaint.		
11/04/2003 Craig Pynes	142 <sup>L240</sup> <sub>20</sub> 0.30	\$183.00 \$54.90	\$54.90	Dispositive Motions - Review and analyze case law allowing court to disregard self-serving allegations in amended complaint where contradicted by prior allegations for demurrer to amended complaint.		
11/04/2003 Craig Pynes	143 <sup>L120</sup> <sub>20</sub> 0.30	\$183.00 \$54.90	\$54.90	Analysis/Strategy - Review and analyze case law re: authority to strike plaintiff's allegation that Liberty misled her by telling her she only needed to cover her mortgage balance for motion to strike.		
·	REDACTED					
11/06/2003 Craig Pynes	150 <sup>L210</sup> <sub>20</sub> 0.10	\$183.00 \$18.30	\$18.30	Pleadings - Prepare Notice of Withdrawal of Demurrer and Motion to Strike in light of plaintiff's amended complaint.		

11/06/2003 Craig Pynes	151 <sup>L210</sup> <sub>20</sub> 0.30	\$183.00\$54.90	\$54.90	Pleadings - Continue preparing Motion to Strike punitive damages and improper allegations from first amended complaint.
11/06/2003 Craig Pynes	152 <sup>L310</sup> <sub>20</sub> 1.10	\$183.00 \$201.30	\$201.30	Written Discovery (RFAs & Interrogatories) - Review file and prepare responses to plaintiff's special interrogatories.
11/06/2003 Craig Pynes	$153\frac{L310}{20}$ 0.50	\$183.00\$91.50	\$91.50	Written Discovery (RFAs & Interrogatories) - Prepare responses to plaintiff's production requests.
11/06/2003 Craig Pynes	154 <sup>L320</sup> <sub>20</sub> 0.40	\$183.00\$73.20	\$73.20	Document Production - Review file re: production of requested documents; and segregating privileged and irrelevant documents.
11/06/2003 Craig Pynes	$155_{20}^{L310}$ 0.80	\$183.00\$146.40	\$146.40	Written Discovery (RFAs & Interrogatories) - Prepare responses to plaintiff's admission requests.
11/06/2003 Craig Pynes	156 <sup>L310</sup> <sub>20</sub> 1.80	\$183.00\$329.40	\$329.40	Written Discovery (RFAs & Interrogatories) - Prepare responses to plaintiff's form interrogatories, including supporting denials of numerous admission requests.
11/07/2003 Craig Pynes	$157_{20}^{L320}$ 0.70	\$183.00\$128.10	\$128.10	Document Production - Review underlying file materials for production and redact privileged information.
11/07/2003 Craig Pynes	$158_{20}^{L240} 0.50$	\$183.00\$91.50	\$91.50	Dispositive Motions - Continue preparing demurrer to first amended complaint.
11/07/2003 Craig Pynes	159 <sup>L210</sup> <sub>20</sub> 0.20	\$183.00 \$36.60	\$36.60	Pleadings - Continue preparing Motion to Strike First Amended Complaint.

11/12/2003 Craig Pynes	163 <sup>L240</sup> <sub>20</sub> 0.50	\$183.00\$91.50	\$91.50	Dispositive Motions - Review and analyze case law re: whether an insurer waives the one year policy limitations period by continuing to investigate a claim for demurrer.
Craig	L240			Dispositive Motions - Supplement

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11/12/2003 Pynes	16420 0.30	\$183.00\$54.90	\$54.90	demurrer to reflect above argument.  Document Production - Continue
11/12/2003 Craig Pynes	165 <sup>L320</sup> <sub>20</sub> 0.40	\$183.00\$73.20	\$73.20	reviewing and redacting documents to be produced in compliance with plaintiff's production requests.
11/12/2003 Craig Pynes	166 <sup>20</sup> <sub>L310</sub> 0.60	\$183.00\$109.80	\$109.80	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiffs' special interrogatories.
11/12/2003 Craig Pynes	167 <sup>L310</sup> <sub>20</sub> 0.50	\$183.00\$91.50	\$91.50	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's admission requests.
11/12/2003 Craig Pynes	168 <sup>L310</sup> <sub>20</sub> 0.30	\$183.00\$54.90	\$54.90	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's production requests.
11/13/2003 Craig Pynes	169 <sup>L210</sup> <sub>20</sub> 0.10	\$183.00 \$18.30	\$18.30	Pleadings - Telephone call from Angela Leon, plaintiff's counsel, re: proposed Second Amended Complaint.
11/13/2003 Craig Pynes	170 <sup>20</sup> <sub>L120</sub> 0.20	\$183.00\$36.60	\$36.60	Analysis/Strategy - Analyze whether plaintiff can file amended complaint without stipulation from Liberty.
11/13/2003 Craig Pynes	$171_{20}^{L210}$ 0.10	\$183.00\$18.30	\$18.30	Pleadings - Prepare email addressing same.
11/13/2003 Craig Pynes	$172_{20}^{L210} 0.60$	\$183.00 \$109.80	\$109.80	Pleadings - Continue preparing Motion to Strike Amended Complaint.
11/13/2003 Craig Pynes	173 <sup>20</sup> L240 0.60	\$183.00 \$109.80	\$109.80	Dispositive Motions - Review and analyze case law re: requirements to waive statute of limitation for supplementation to demurrer to amended complaint.
11/13/2003 Craig Pynes	$174_{20}^{L240}$ 0.50	\$183.00\$91.50	\$91.50	Dispositive Motions - Supplement demurrer to address above issues.
11/13/2003 Craig Pynes	175 L240 0.50	\$183.00\$91.50	\$91.50	Dispositive Motions - Review and analyze case law re: whether appraisal requires case dismissal, if so, under what conditions and to what extent for demurrer to first amended complaint.
11/14/2003 Craig Pynes	176 <sup>L120</sup> <sub>20</sub> 0.10	\$183.00\$18.30	\$18.30	Analysis/Strategy - Prepare memo to file re: preclusion of second amended complaint without leave if responsive pleadings filed before same.

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11/17/2003 Craig Pynes	179 <sup>20</sup> <sub>L240</sub> 0.50	\$183.00 \$91.50	\$91.50	Dispositive Motions - Continue preparing demurrer to first amended complaint.
11/17/2003 Craig Pynes	$180_{20}^{L210}$ 0.30	\$183.00\$54.90	\$54.90	Pleadings - Continue preparing motion to strike amended complaint.
11/17/2003 Craig Pynes	181 <sup>L240</sup> <sub>20</sub> 0.20	\$183.00 \$36.60	\$36.60	Dispositive Motions - Prepare request for judicial notice in support of demurrer and motion to strike and cases and documentation in support of same.
11/20/2003 Craig Pynes	182 <sup>L110</sup> <sub>20</sub> 0.20	\$183.00\$36.60	\$36.60	Fact Investigation/Development - Prepare letter to client and email/memo to Susan Olson re: demurrer and motion to strike amended complaint.
11/21/2003 Craig Pynes	184 <sup>L310</sup> <sub>20</sub> 0.80	\$183.00\$146.40	\$146.40	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's form interrogatories.
11/21/2003 Craig Pynes	185 <sup>L310</sup> <sub>20</sub> 0.20	\$183.00\$36.60	\$36.60	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's production requests.
11/21/2003 Craig Pynes	186 <sup>L310</sup> <sub>20</sub> 0.40	\$183.00\$73.20	\$73.20	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's special interrogatories.
11/21/2003 Craig Pynes	183 <sup>L310</sup> <sub>20</sub> 0.40	\$183.00\$73.20	\$73.20	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's admission requests.
11/24/2003 Craig Pynes	195 <sup>L310</sup> <sub>20</sub> 0.10	\$183.00\$18.30	\$18.30	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's special interrogatories.
11/24/2003 Craig Pynes	196 <sup>L310</sup> <sub>20</sub> 0.10	\$183.00\$18.30	\$18.30	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's admission requests.
11/24/2003 Craig Pynes	197 L310 0.20	\$183.00\$36.60	\$36.60	Written Discovery (RFAs & Interrogatories) - Review Aces notes re: supplementation of discovery responses.



11/24/2003 Craig Pynes 194 L310 0.20 \$183.00 \$36.60 \$36.60

Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's production requests.

11/25/2003 Craig Pynes	198 <sup>L110</sup> <sub>20</sub> 0.10	\$183.00 \$18.30	\$18.30	Fact Investigation/Development - Review court file re: whether plaintiff improperly filed Second Amended Complaint without court permission and after demurrer filed to operative complaint as threatened.		
11/25/2003 Craig Pynes	199 <sup>20</sup> <sub>L110</sub> 0.10	\$183.00 \$18.30	\$18.30	Fact Investigation/Development - Telephone conference with Stephen Losh re: provision of responsive pleadings.		
	REDACTED					
12/01/2003 Craig Pynes	201 <sup>L310</sup> <sub>20</sub> 0.20	\$183.00\$36.60	\$36.60	Written Discovery (RFAs & Interrogatories) - Prepare emails/ memos re: discovery issues and client review. Fact Investigation/Development -		
12/01/2003 Craig Pynes	$202_{20}^{L110}$ 0.20	\$183.00 \$36.60	\$36.60	Review and analyze Second Amended Complaint.		
12/01/2003 Craig Pynes		\$183.00 \$36.60		Analysis/Strategy - Review and analyze prohibition against filing second amended complaint absent stipulation or motion to amend.		
12/02/2003 Craig Pynes	204 <sup>20</sup> <sub>L110</sub> 0.20	\$183.00 \$36.60	\$36.60	Fact Investigation/Development - Review court docket re: court's acceptance of improperly filed second amended complaint and telephone		

12/02/2003 Craig Pynes	205 <sup>L110</sup> <sub>20</sub> 0.20	\$183.00\$36.60	\$36.60	conference re: same. Fact Investigation/Development - Prepare emails/ memos re: same.
RE	DACTED			
12/03/2003 Craig Pynes	207 <sup>L310</sup> <sub>20</sub> 0.20	\$183.00\$36.60	\$36.60	Written Discovery (RFAs & Interrogatories) - Supplement interrogatory responses re: last known addresses for various employees.
12/04/2003 Craig Pynes	$211^{L120}_{20}$ 0.10	\$183.00\$18.30	\$18.30	Analysis/Strategy - Meet and confer requirements in conjunction with upcoming case management conference.
12/04/2003 Craig Pynes	212 <sup>L230</sup> <sub>20</sub> 0.10	\$183.00 \$18.30	\$18.30	Court-Mandated Conferences - Telephone conference with plaintiff's counsel to comply with same.
12/04/2003 Craig Pynes	$213 \frac{L230}{20} 0.30$	\$183.00\$54.90	\$54.90	Court-Mandated Conferences - Review file and prepare CMC Statement.
	REDACTED			
				Written Discovery (RFAs &

12/04/2003 Craig Pynes	210 <sup>20</sup> <sub>L310</sub> 0.40	\$183.00 \$73.20	\$73.20	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to special and form interrogatories and supplement with information recently sent by client.
12/05/2003 Craig Pynes	$215 \frac{L210}{20} \ 0.10$	\$183.00 \$18.30	\$18.30	Pleadings - Prepare request for judicial notice attaching same in further support of demurrer to first amended complaint.
12/05/2003 Craig Pynes	$214_{20}^{L120} 0.20$	\$183.00 \$36.60	\$36.60	Analysis/Strategy - Review and analyze Statement of Decision re: Demurrer in Northridge Earthquake Litigation for use in support of demurrer to First Amended Complaint.
12/08/2003 Craig Pynes	216 <sup>L210</sup> <sub>20</sub> 0.10	\$183.00\$18.30	\$18.30	Pleadings - Continue preparing request for judicial notice of additional court order re: application of CCP 340.9 for support of demurrer and motion to strike.

12/16/2003 Craig Pynes	219 <sup>L120</sup> <sub>20</sub> 0.30	\$183.00\$54.90	\$54.90	Analysis/Strategy - Review and analyze case law and statutory requirements re: Objecting to and responding to Plaintiff's Notice of Related cases and Request for Transfer of action.
12/16/2003 Craig Pynes	220 <sup>20</sup> <sub>L210</sub> 0.30	\$183.00 \$54.90	\$54.90	Pleadings - Draft Objection and response to same.
12/16/2003 Craig Pynes	221 <sup>20</sup> <sub>L230</sub> 0.20	\$183.00 \$36.60	\$36.60	Court-Mandated Conferences - Telephone conference with Angela Leon re: CMC meet and confer and supplement CMC statement re: same.
12/16/2003 Craig Pynes	222 <sup>L120</sup> <sub>20</sub> 0.80	\$183.00\$146.40	\$146.40	Analysis/Strategy - Review and analyze case law re: court's ability to review letters referenced in complaint that contradict original complaint's allegations for Objections/ response to Notice of Filing Second Amended Complaint.
12/16/2003 Craig Pynes	223 <sup>20</sup> 1.120 0.10	\$183.00\$18.30	\$18.30	Analysis/Strategy - Review plaintiff's Notice of Second Amended Complaint and Notice of Related Cases and request to transfer action.
12/16/2003 Craig Pynes	224 <sup>20</sup> <sub>L120</sub> 0.30	\$183.00\$54.90	\$54.90	second amended complaint.
12/16/2003 Craig Pynes	225 <sup>L120</sup> <sub>20</sub> 0.10	\$183.00 \$18.30	\$18.30	Analysis/Strategy - Review file materials for use in Objecting to and responding to same.
12/16/2003 Craig Pynes	$226_{20}^{L210}$ 0.40	\$183.00 \$73.20	\$73.20	Pleadings - Draft Objection and response to same. Pleadings - Continue preparing
12/17/2003 Craig Pynes	227 <sup>L210</sup> <sub>20</sub> 0.20	\$183.00 \$36.60	\$36.60	Objection and Response to plaintiff's Notice of Filing Second Amended Complaint.
12/17/2003 Craig Pynes	228 <sup>L210</sup> <sub>20</sub> 0.10	\$183.00 \$18.30	\$18.30	Pleadings - Continue preparing Objection and Response to Plaintiff's Notice and Request to Transfer Action to CCW.

# REDACTED

		·	
12/24/2003 Craig	$230_{20}^{L310}$ 1.60	\$183.00 \$292.80	\$292.80

Written Discovery (RFAs & Interrogatories) - Review file and begin preparing extensive special interrogatories to plaintiff.

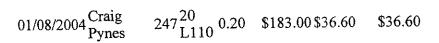


12/29/2003 Craig Pynes	232 <sup>L310</sup> <sub>20</sub> 0.70	\$183.00 \$128.10	\$128.10	Written Discovery (RFAs & Interrogatories) - Continue preparing extensive special interrogatories to plaintiff.
12/29/2003 Craig Pynes	$233\frac{L310}{20}$ 0.10	\$183.00 \$18.30	\$18.30	Written Discovery (RFAs & Interrogatories) - Prepare declaration of Craig Pynes in support of extensive interrogatories.
12/29/2003 Craig Pynes	$234_{L310}^{20} 0.50$	\$183.00\$91.50	\$91.50	Written Discovery (RFAs & Interrogatories) - Prepare production requests to plaintiff.
12/29/2003 Craig Pynes	237 <sup>20</sup> <sub>L210</sub> 0.20	\$183.00\$36.60	\$36.60	Pleadings - Review plaintiff's response to Liberty's Objection and response to Notice of Filing Second Amended Complaint; request for judicial notice on same; and response re: request for transfer to CCW.
12/29/2003 Craig Pynes	$238_{20}^{L120} 0.10$	\$183.00 \$18.30	\$18.30	Analysis/Strategy - Review and analyze propriety of request to transfer to identified cases.
12/29/2003 Craig Pynes	$235\frac{\text{L}310}{20}$ 0.20	\$183.00 \$36.60	\$36.60	Written Discovery (RFAs & Interrogatories) - Prepare admission requests to plaintiff.
12/29/2003 Craig Pynes	$236_{20}^{L310} 0.20$	\$183.00 \$36.60	\$36.60	Written Discovery (RFAs & Interrogatories) - Prepare form interrogatories to plaintiff.

243<sup>L210</sup><sub>20</sub> 0.10 \$183.00\$18.30 01/05/2004 Craig Pynes \$18.30 Pleadings - Continue preparing letter to plaintiffs' counsel re: CCW case filing requirements and letter to client re: case transfer.

#### REDACTED

Fact Investigation/Development -



Telephone conference with Angela Leon re: responding to Liberty's statement to the court; CMC statement and further handling on transferred action.

#### REDACTED

Written Discovery (RFAs & Interrogatories) - Prepare interrogatories and production requests to plaintiff.

#### REDACTED

01/12/2004 Craig Pynes	253 <sup>L210</sup> <sub>20</sub> 0.10	\$183.00 \$18.30	\$18.30	Pleadings - Telephone conference with plaintiff's counsel, Angela Leon, re: information on case handling after transfer.
01/12/2004 Craig Pynes	254 <sup>L310</sup> <sub>20</sub> 0.20	\$183.00\$36.60	\$36.60	Written Discovery (RFAs & Interrogatories) - Telephone conference with plaintiff's counsel re: discovery responses and production in light of case transfer and production of claims documents.

#### **REDACTED**

$$\frac{\text{Craig}}{\text{Pynes}} = 255 \frac{20}{\text{L}120} = 0.20 \quad \$183.00 \,\$36.60 \quad \$36.60 \quad \$36.60 \quad \text{Analysis/Strategy - Review file and provide requested information for extensive case evaluation.}$$

02/10/2004 <sup>Craig</sup> Pynes	275 <sup>L120</sup> 0.60	\$193.00 \$115.80	\$115.80	Analysis/Strategy - Analyze equitable tolling issues for status report to client.
	REDACTE	D		
02/11/2004 Craig Pynes	278 <sup>L240</sup> <sub>20</sub> 0.40	\$193.00\$77.20	\$77.20	Dispositive Motions - Review and analyze whether court can take judicial notice of letters that directly contradict pleadings, where earlier pleading omits critical fact relied on in subsequent pleading to circumvent demurrer for demurrer to second amend
02/11/2004 Craig Pynes	$279_{20}^{L240}$ 0.80	\$193.00 \$154.40	\$154.40	Dispositive Motions - Prepare demurrer to plaintiff's second amended complaint.
02/11/2004 Craig Pynes	$280_{L240}^{20}$ 0.20	\$193.00 \$38.60	\$38.60	Dispositive Motions - Prepare request for judicial notice in support of demurrer to second amended complaint.
02/11/2004 Craig Pynes	281 <sup>20</sup> 1.210 0.50	\$193.00 \$96.50	\$96.50	Pleadings - Prepare motion to strike punitive damages and irrelevant allegations from second amended complaint.
	REDACTE	D		
02/13/2004 Craig Pynes	<i>5-4</i> √	\$193.00\$77.20	\$77.20	Analysis/Strategy - Review and analyze case law re: court permitted to review documents outside pleadings where plaintiff skips step of moving to amend for demurrer to second amended complaint.  Dispositive Motions - Continue
02/13/2004 Craig Pynes	$284_{20}^{L240}$ 0.60	\$193.00\$115.80	\$115.80	
02/13/2004 Craig	285 L240 0.20	\$193.00 \$38.60	\$38.60	Dispositive Motions - Continue preparing extensive request for judicial

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Pynes

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notice in support of demurrer.

#### REDACTED

02/17/2004 Craig Pynes	289 <sup>L240</sup> <sub>20</sub> 0.60	\$193.00 \$115.80	\$115.80	Dispositive Motions - Continue preparing demurrer to second amended complaint.
02/17/2004 Craig Pynes	290 <sup>L240</sup> <sub>20</sub> 0.10	\$193.00 \$19.30	\$19.30	Dispositive Motions - Continue preparing request for judicial notice in support of demurrer to second amended complaint.
02/17/2004 Craig Pynes	291 <sup>L120</sup> 0.40	\$193.00 \$77.20	\$77.20	Analysis/Strategy - Review recent California or Ninth Circuit cases addressing equitable estoppel tolling on CCP 340.9 preclusion of reopened earthquake claims after closure of statutory period for demurrer to second amended complaint.
02/17/2004 Craig Pynes	292 <sup>L240</sup> <sub>20</sub> 0.70	\$193.00\$135.10	\$135.10	Dispositive Motions - Review and analyze case law re: court's ability to take judicial notice of orders of other courts; policy; extrinsic letters that contradict the complaint and non-California case law for demurrer.  Dispositive Motions - Prepare points and
02/17/2004 Craig Pynes	293 L240 0.50	\$193.00\$96.50	\$96.50	authorities that the court can take judicial notice of orders of other courts; policy; extrinsic letters that contradict the complaint and non-California case law for demurrer.
02/17/2004 Craig Pynes	294 <sup>20</sup> <sub>L210</sub> 0.50	\$193.00\$96.50	\$96.50	Pleadings - Continue preparing motion to strike second amended complaint.

#### **REDACTED**

02/18/2004 Craig Pynes 298 L310 1.70 \$193.00 \$328.10 \$328.10

Written Discovery (RFAs & Interrogatories) - Continue preparing special interrogatories to plaintiff (over 150 interrogatories).

Bottomline Legal eXchange

02/18/2004 Craig Pynes	299 <sup>L310</sup> <sub>20</sub> 0.10	\$193.00\$19.30	\$19.30	Written Discovery (RFAs & Interrogatories) - Continue preparing declaration of necessity in support of extensive special interrogatories.
02/18/2004 Craig Pynes	300 <sup>20</sup> <sub>L310</sub> 0.20	\$193.00\$38.60	\$38.60	Written Discovery (RFAs & Interrogatories) - Prepare form interrogatories to plaintiff.

02/19/2004 Craig Pynes				Pleadings - Review and analyze case law re: moving to strike letters that Liberty waived application of Code of Civil Procedure section 340.9 as false statements and prepare memo to file re: probable success in moving to strike on this basis.
02/19/2004 Craig Pynes	$303_{20}^{L210} 0.50$	\$193.00\$96.50	\$96.50	Pleadings - Continue preparing motion to strike.
02/19/2004 Craig Pynes				
02/19/2004 Craig Pynes	305 <sup>20</sup> <sub>L120</sub> 0.40	\$193.00\$77.20	\$77.20	Analysis/Strategy - Review whether case law addressing judicial notice for fire insurance policies requires judicial notice of homeowner's policy with earthquake coverage for request for judicial notice.
02/19/2004 Craig Pynes	306 <sup>L310</sup> <sub>20</sub> 0.60	\$193.00 \$115.80	\$115.80	(almost /0 requests).
02/19/2004 Craig Pynes	$307_{20}^{L310} 0.10$	\$193.00 \$19.30	\$19.30	Written Discovery (RFAs & Interrogatories) - Continue preparing admission requests to plaintiff.
02/20/2004 Craig Pynes	$308_{20}^{L210} 0.30$	\$193.00 \$57.90	\$57.90	Pleadings - Continue preparing motion to strike second amended complaint.

Craig	20 0 20	¢102 00 ¢20 40		Pleadings - Continue preparing request for judicial notice and numerous exhibits
02/20/2004 Craig Pynes	$309_{L210}^{20}$ 0.20	\$193.00\$38.60		for same.
02/20/2004 Craig Pynes	$310_{20}^{L240}$ 0.30	\$193.00 \$57.90		Dispositive Motions - Continue preparing demurrer to second amended complaint.
02/20/2004 Craig Pynes	311 <sup>L310</sup> <sub>20</sub> 0.10	\$193.00 \$19.30	\$19.30	Written Discovery (RFAs & Interrogatories) - Continue preparing form interrogatories to plaintiff. Written Discovery (RFAs &
02/20/2004 Craig Pynes	$312_{20}^{L310}$ 0.60	\$193.00\$115.80	\$115.80	Interrogatories) - Continue preparing special interrogatories to plaintiff (150 interrogatories).
02/20/2004 Craig Pynes	313 <sup>L310</sup> <sub>20</sub> 0.10	\$193.00\$19.30	\$19.30	Written Discovery (RFAs & Interrogatories) - Continue preparing declaration of Necessity in support of extensive interrogatories to plaintiff.
02/20/2004 Craig Pynes	$314_{20}^{L310} 0.40$	\$193.00\$77.20	\$77.20	Written Discovery (RFAs & Interrogatories) - Continue preparing production requests to plaintiff.
	REDACTE			
02/23/2004 Craig Pynes	316 <sup>L210</sup> <sub>20</sub> 0.30	\$193.00 \$57.90	\$57.90	Pleadings - Continue preparing request for judicial notice and supporting exhibits for same.
02/24/2004 Craig Pynes	317 <sup>20</sup> 1.20	\$193.00\$231.60	\$231.60	supporting declaration of necessity.
02/24/2004 Craig Pynes	318 <sup>20</sup> <sub>L310</sub> 0.40	\$193.00\$77.20	\$77.20	Written Discovery (RFAs & Interrogatories) - Continue preparing production requests to plaintiff (over 60 requests).
02/25/2004 Craig Pynes	319 <sup>L210</sup> <sub>20</sub> 0.20	\$193.00\$38.60	\$38.60	Pleadings - Prepare letter to client re: demurrer and motion to strike.
	REDACTED	)		
02/26/2004 Craig Pynes	$320\frac{L210}{20} \ 0.19$	0 \$193.00\$19.30	\$19.30	Pleadings - Continue preparing letter to Liberty re: demurrer and motion to strike. Written Discovery (RFAs &
02/26/2004 Craig Pynes	321 L310 0.7	0 \$193.00\$135.1	0 \$135.10	

Bottomline	Legal	eXchange
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02/27/2004 Craig Pynes	323 <sup>L320</sup> <sub>20</sub> 0.20	\$193.00 \$38.60	\$38.60	calls with Angela Leon, Beverly Hills Legal Center, re: review of claim files and their production of documents.
02/27/2004 Craig Pynes	324 <sup>20</sup> <sub>L320</sub> 0.20	\$193.00\$38.60	\$38.60	Document Production - Prepare letter to Angela Leon, plaintiffs' counsel, re: document review.
02/27/2004 Craig Pynes	$325_{20}^{L310} 0.10$	\$193.00 \$19.30	\$19.30	Written Discovery (RFAs & Interrogatories) - Continue preparing production requests to plaintiff.
02/27/2004 Craig Pynes	$326_{20}^{L310} 0.20$	\$193.00 \$38.60	\$38.60	Written Discovery (RFAs & Interrogatories) - Continue preparing special interrogatories to plaintiff.
02/27/2004 Craig Pynes	$327 \frac{L320}{20} 0.10$	\$193.00 \$19.30	\$19.30	Document Production - Continue preparing admission requests to plaintiff.
02/27/2004 Craig Pynes	$328_{20}^{L310} 0.10$	\$193.00\$19.30	\$19.30	Written Discovery (RFAs & Interrogatories) - Continue preparing form interrogatories to plaintiff.

03/01/2004 Craig Pynes	331 <sup>L320</sup> <sub>20</sub> 0.20	\$193.00 \$38.60	\$38.60	Document Production - Review claim manual documents to be produced to plaintiff's counsel and claim manual index for same.
03/01/2004 Craig Pynes	$332_{L320}^{20} 0.10$	\$193.00\$19.30	\$19.30	Document Production - Telephone conference with Angela Leon re: document production.  Document Production - Review file re:
03/01/2004 Craig Pynes	333 <sup>L320</sup> <sub>20</sub> 0.20	\$193.00 \$38.60	\$38.60	plaintiff's counsel's execution of stipulation for protective order and continue preparing letter to Angela Leon re: groundrules for document production.
03/02/2004 Craig Pynes	334 <sup>L320</sup> <sub>20</sub> 0.20	\$193.00 \$38.60	\$38.60	Document Production - Prepare letter to plaintiffs' counsel re: document production.
03/02/2004 Craig Pynes	335 <sup>L320</sup> <sub>20</sub> 0.20	\$193.00 \$38.60	\$38.60	Document Production - Two telephone conferences with plaintiff's counsel, Angelica Leon, re; rescheduling document production and discovery.
03/04/2004 Craig Pynes	336 <sup>L120</sup> <sub>20</sub> 0.50	\$193.00 \$96.50	\$96.50	Analysis/Strategy - Review very recent case law interpreting Insurance Code 2071 in earthquake context for reply in support of demurrer.
03/05/2004 Craig Pynes	$337_{20}^{L320} 0.10$	\$193.00 \$19.30	\$19.30	Document Production - Review plaintiff's counsel's meet and confer letter re: document production.

03/05/2004 Craig Pynes	338 <sup>L320</sup> <sub>20</sub> 0.10	\$193.00\$19.30	\$19.30	Document Production - Telephone conference with plaintiff's counsel re: document production.
03/05/2004 Craig Pynes	339 <sup>L320</sup> <sub>20</sub> 0.20	\$193.00 \$38.60	\$38.60	Document Production - Prepare letter to plaintiff's counsel, Angelica Leon, re: responding to her letter regarding supplemental production.
03/05/2004 Craig Pynes	340 <sup>L320</sup> <sub>20</sub> 0.60	\$193.00\$115.80	\$115.80	Document Production - Prepare privilege log in relation to redacted documents.
	REDACTE	D		
03/09/2004 Craig Pynes	342 <sup>L320</sup> <sub>20</sub> 0.10	\$193.00\$19.30	\$19.30	Document Production - Continue preparing meet and confer letter to plaintiffs' counsel re: document production.
03/09/2004 Craig Pynes	343 <sup>20</sup> <sub>L320</sub> 0.20	\$193.00 \$38.60	\$38.60	Document Production - Continue preparing privilege log of documents witheld or redacted.
03/09/2004 Craig Pynes	344 <sup>L320</sup> <sub>20</sub> 0.20	\$193.00\$38.60	\$38.60	Document Production - Two telephone conferences with plaintiff's counsel, Angelica Leon, re: review of claim manual documents and discuss redactions of produced documents.
03/09/2004 Craig Pynes	345 L210 0.10	\$193.00 \$19.30	\$19.30	Pleadings - Review file and court file re: plaintiff's overdue oppositions to Liberty's demurrer and motion to strike.

03/11/2004 Craig Pynes	348 <sup>L240</sup> <sub>20</sub> 0.20	\$193.00\$38.60	\$38.60	Dispositive Motions - Prepare reply brief in support of Liberty's demurrer and motion to strike second amended complaint.
03/11/2004 Craig Pynes	349 <sup>L320</sup> <sub>20</sub> 0.40	\$193.00\$77.20	\$77.20	Document Production - Review claim manual documents in preparation for their production to plaintiff's counsel.
03/11/2004 Craig Pynes	$350^{20}_{L320}$ 0.40	\$193.00\$77.20	\$77.20	Document Production - Meet with plaintiff's counsel re: production.
03/11/2004 Craig Pynes	351 <sup>L210</sup> <sub>20</sub> 0.20	\$193.00\$38.60	\$38.60	Pleadings - Review file and court website re: plaintiff's opposition to Liberty's demurrer and motion to strike and prepare memo to file re: same.  Document Production - Continue

03/11/2004 Craig Pynes	$352_{20}^{L320} 0.10$	\$193.00\$19.30	\$19.30	preparing letter to plaintiff's counsel and privilege log.			
REDACTED							
03/15/2004 Craig Pynes	354 <sup>L320</sup> <sub>20</sub> 0.10	\$193.00\$19.30	\$19.30	Document Production - Review further meet and confer letter from plaintiff's counsel re: document production.  Document Production - Review file re:			
03/15/2004 Craig Pynes	$355_{L320}^{20} 0.10$	\$193.00\$19.30	\$19.30	documents witheld or redacted and discuss with Susan O.			
03/15/2004 Craig Pynes	356 <sup>L240</sup> <sub>20</sub> 0.40	\$193.00\$77.20	\$77.20	Dispositive Motions - Continue preparing reply in support of Liberty's demurrer and motion to strike.			

03/16/2004 Craig Pynes	$360_{20}^{L240}$ 0.30	\$193.00\$57.90		Dispositive Motions - Review plaintiff's opposition to Liberty's demurrer.
03/16/2004 Craig Pynes	$361_{20}^{L210} 0.30$	\$193.00\$57.90	\$57.90	Pleadings - Review plaintiff's opposition to Liberty's motion to strike.

Bottomline Legal eXchange

REDACTED

REDACTED

## **REDACTED**

**REDACTED** 

#### **REDACTED**

# REDACTED

Expenses:

Date TK LI Code Hours Rate

Orig. Curr. Amt Amt

Description

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#### REDACTED

10/07/2003 Craig Pynes 420 E112 338.80 \$1.00 \$338.80 \$338.80 Court fees - 10/07/03; Superior Court Clerk; First Appearance + 2 Notices

#### REDACTED

# REDACTED

Billing Summary:

Orig. Amt Curr. Amt

Fees:

Expenses:

REDACTED

Totals:

Close